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July 4, 2006

The Honorable Joseph J. Farnan, Jr.  
 United States District Court  
 844 North King Street  
 Wilmington, DE 19801

RE: *LG.Philips LCD Co., Ltd. v. Tatung Company of Amercia, et al.*  
C.A. No. 05-292-JJF

Dear Judge Farnan:

I write on behalf of plaintiff LG.Philips LCE Co., Ltd. ("LPL"). I have Mr. Fineman's letter to the Court on behalf of the defendants dated July 3, 2006 (D.I. 276) proffering a jury questionnaire with a request that that Court direct that it be sent to the prospective jurors in this case. Mr. Fineman states that LPL does not join in the defendants' request. In fact, LPL opposes defendants' request, for the following reasons:

- The Court either has already sent or will soon send its own questionnaire. Defendants' proposed questionnaire largely duplicates the Court's. Sending a duplicate will be confusing and burdensome to the prospective jurors.
- Some of defendants' proposed questions are unnecessarily intrusive on the prospective jurors' privacy (e.g., membership in political or civic organizations, spouse's job, claims for disability benefits) without leading to the revelation of any legitimate grounds on which to strike.
- Other questions are clearly biased to the defendants' point of view and appear intended to influence the prospective jurors (e.g., question 26: "Do you feel that a company that is sued should have to prove that it has done nothing wrong?").

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LPL requests the opportunity to be heard on this subject at the pretrial conference on Thursday, July 6, 2006.

Respectfully submitted,

/s/ Richard D. Kirk (rk0922)

:rdk  
cc: Clerk of the Court  
All counsel as shown on attached certificate

**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on July 4, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent on July 4, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

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